

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
GREENSPOON MARDER LLP
200 East Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301
Tel: 954 491-1120
Facsimile: 954-343-5624
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
Nevada Bar No. 11276
GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Ste. 400
Las Vegas, NV 89169
Tel: 702-978-4249
Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton
Nevada Bar No. 5065
Gregory Kraemer
COOPER LEVENSON, P.A.
1835 Village Center Circle
Las Vegas, NV 89134
T: (702) 366-1125
F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS INTERNATIONAL,
INC., a Delaware Corporation; DIAMOND
RESORTS CORPORATION, a Maryland
Corporation; DIAMOND RESORTS U.S.
COLLECTION DEVELOPMENT, LLC, a
Delaware Limited Liability Company; and
DIAMOND RESORTS MANAGEMENT,
INC., an Arizona Corporation,

Plaintiffs,

v.

REED HEIN & ASSOCIATES, LLC d/b/a

Case No.: 2:17-cv-03007-APG-VCF

**JOINT STIPULATION TO EXTEND
DEADLINES**

[Second Request]

TIMESHARE EXIT TEAM, a Washington Limited Liability Company; BRANDON REED, an individual and citizen of the State of Washington; TREVOR HEIN, an individual and citizen of Canada; THOMAS PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to Local Rules 6-1 and 7-1, Plaintiff DIAMOND RESORTS CORPORATION (“DRC”), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM, BRANDON REED, TREVOR HEIN, THOMAS PARENTEAU (collectively, “TET Defendants”), HAPPY HOUR MEDIA GROUP, LLC (“HHMG”), MITCHELL REED SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES (“Sussman”), SCHROETER GOLDMARK & BENDER, P.S. (“SGB”), and KEN B.. PRIVETT, ESQ. (“Privett”), by and through their respective attorneys of record, stipulate as stated below. TET Defendants, HHMG, Sussman, SGB, and Privett are collectively referred to as “Defendants”. DRC and Defendants are collectively referred to herein as the “Parties”. The Parties hereby stipulate and agree as follows:

1. On November 25, 2019, this Court granted in part TET Defendants and HHMG’s Motions to Dismiss (hereinafter, the “Order”) [ECF No. 141].

2. The Order provided Plaintiff until December 23, 2019 to file a Second Amended Complaint (“SAC”).

3. Due to the upcoming holiday season, the Parties stipulated to extend the deadline to file the SAC until January 12, 2020 (ECF #142). The Court granted the requested extension on

December 20, 2019 (ECF No. 144).

4. In the SAC, Plaintiff intends to significantly narrow the scope of this litigation, most notably by drastically reducing the number of timeshare owners that are the subject of this litigation.

5. Since the prior extension was granted, Plaintiff has been working diligently to identify the reduced scope of owners, however due to the limited discovery that has been conducted to date, the process has taken significantly longer than expected.

6. Based on this delay, the Parties have agreed to extend the deadline to file the SAC for thirty (30) days, until February 12, 2020. Additionally, based on prior stipulation, Defendants' responses to the SAC will be due 30 days after the SAC is filed (March 13, 2020).¹

7. This stipulation is not made for purposes of delay, but rather to limit the scope of this case and maximize judicial efficiency.

Dated this 8th day of January, 2020

Respectfully Submitted By:

GREENSPOON MARDER, LLP

GORDON REES SCULLY MANSUKHANI,
LLP

/s/ Phillip A. Silvestri, Esq.
PHILLIP A. SILVESTRI, ESQ.
Nevada Bar No. 11276
3993 Howard Hughes Parkway, Suite 400
Las Vegas, NV 89169

/s/ Dione C. Wrenn, Esq.
ROBERT S. LARSEN, ESQ.
Nevada Bar No. 7785
DAVID T. GLUTH, II, ESQ.
Nevada Bar No. 10596
DIONE C. WRENN, ESQ.
Nevada Bar No. 13285
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101

and

RICHARD W. EPSTEIN, ESQ.
Admitted Pro Hac Vice
JEFFREY BACKMAN, ESQ.
Admitted Pro Hac Vice
MICHELLE E DURIEUX, ESQ.
Admitted Pro Hac Vice

Attorneys for Defendants
Reed Hein & Associates, LLC dba Timeshare
Exit Team, Brandon Reed, Trevor Hein,
Thomas Parenteau, and Happy Hour Media

¹ Because this extension will render the currently-scheduled expert disclosure deadline untenable, the Parties will file a subsequent stipulation to extend various other deadlines upon approval of this stipulation.

200 East Broward Blvd., Suite 1800
Fort Lauderdale, FL 33301

and

COOPER LEVENSON, P.A.
KIMBERLY MAXON-RUSHTON, ESQ.
Nevada Bar No. 5065
GREGORY KRAEMER, ESQ.
Nevada Bar No. 10911
1835 Village Center Circle
Las Vegas, NV 89134

*Attorneys for Plaintiff
Diamond Resorts Corporation*

THE LAW OFFICES OF MITCHELL
REED SUSSMAN & ASSOCIATES

/s/ Mitchell Reed Sussman, Esq.
MITCHELL REED SUSSMAN, ESQ.
(Pro Hac Vice)
California Bar No. 75107
1053 S. Palm Canyon Drive
Palm Springs, California 92264

and

BAILEY KENNEDY, LLP
JOSEPH A. LIEBMAN, ESQ.
Nevada Bar No. 10125
8984 Spanish River Avenue
Las Vegas, Nevada 89148

*Attorneys for Defendant
Mitchell Reed Sussman Esq. dba
The Law Offices of Mitchell
Reed Sussman & Associates*

Group, LLC

LIPSON NEILSON, P.C.

/s/ Megan H. Hummel, Esq.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. HUMMEL, ESQ.
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120 Las
Vegas, NV 89144-7052

*Attorneys for Defendant
Schroeter, Goldmark & Bender, P.S.*

ALVERSON TAYLOR & SANDERS

/s/ Courtney Christopher, Esq.
LEANN SANDERS, ESQ.
Nevada Bar No. 000390
COURTNEY CHRISTOPHER, ESQ. Nevada Bar
No. 012717
6605 Grand Montecito Parkway, Suite 200 Las
Vegas, Nevada 89149

Attorney for Defendant

Ken B. Privett, Esq.

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

1-13-2020
DATED: _____